TODD KIM

Assistant Attorney General U.S. Department of Justice Environment and Natural Resources Division

HAYLEY A. CARPENTER (CA Bar No. 312611)
TYLER M. ALEXANDER (CA Bar No. 313188)
Trial Attorneys
Natural Resources Section
150 M St. NE, Washington, D.C.
Washington, DC 20002
(202) 305-0242 (Carpenter)
(202) 305-0238 (Alexander)
hayley.carpenter@usdoj.gov
tyler.alexander@usdoj.gov

Attorneys for Defendants

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON MEDFORD DIVISION

BLUE MOUNTAINS BIODIVERSITY PROJECT, an Oregon non-profit corporation,	)	Case No. 1:22-cv-01500-Cl
Plaintiff,	) )	AONAT GELATIVA DEDODE

v.

HOMER WILKES, in his official capacity as Undersecretary for Natural Resources and Environment, United States Department of Agriculture; GLENN CASAMASSA, in his official capacity as Regional Forester for Region 6; SHANE JEFFRIES, in his official capacity as Forest Supervisor of the Ochoco National Forest; MICHAEL RAMSEY, in his official capacity as District Ranger for the Lakeview Ranger District, Fremont Winema National Forest; and the UNITED STATES FOREST SERVICE,

Defendants.

JOINT STATUS REPORT

The Parties hereby submit a joint status report in accordance with the Court's Order of April 23, 2024. ECF No. 47. After conferring, the Parties seek a further 60-day stay of all litigation deadlines to allow time for Defendants to decide whether to appeal the order vacating the Eastside Screens Amendment in *Greater Hells Canyon Council v. Wilkes*, 2:22-cv-00859-HL, and whether to proceed with any portion of the South Warner Project, which Plaintiffs challenge here. The Parties will need to take these decisions into account when planning the course of the remainder of this case. Accordingly, the Parties ask for a joint status report due date in 60 days wherein the Parties will apprise the Court of any relevant developments in the case and ask for an extension of the stay, a resumption of deadlines, or resolution of the case.

No Party will be prejudiced by the requested 60-day stay given that the Eastside Screens Amendment has been vacated, and the Forest Service will not implement the South Warner Project during the stay. The requested stay may also be a resource-saving measure if the Parties are able to resolve the case without further litigation.

Respectfully submitted this 24th day of June, 2024.

TODD KIM
Assistant Attorney General
U.S. Department of Justice
Environment and Natural Resources Division

/s/ Tyler M. Alexander
HAYLEY A. CARPENTER (CA Bar No. 312611)
TYLER M. ALEXANDER (CA Bar No. 313188)
Trial Attorneys
Natural Resources Section
P.O. Box 7611
Washington, DC 20044
(202) 305-0242 (Carpenter)
(202) 305-0238 (Alexander)
hayley.carpenter@usdoj.gov
tyler.alexander@usdoj.gov

Attorneys for Defendants

/s/ Thomas Buchele (permission via email)

THOMAS BUCHELE (OSB No. 081560)

Earthrise Law Center Lewis and Clark Law School 10101 S. Terwilliger Blvd. Portland, OR 97219-7799

Tel: 503-768-6736 Fax: 503-768-6642

Email: tbuchele@lclark.edu

AUSTIN STARNES (OSB No. 224970) Blue Mountains Biodiversity Project 455 NE 24<sup>th</sup> Ave, #31 Portland, OR 97232

Tel: 317-964-3776

Email: austin@bmbp.org

Attorneys for Plaintiffs